

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ANDERSON/GREENWOOD DIVISION**

W.S.,	)	Case No.: 16-cv-01032-MGL
	)	
Plaintiff,	)	
	)	
v.	)	<b>Defendant's Motion to Compel</b>
	)	<b>Production of Settlement Agreement</b>
Cassandra Daniels, Ursula Best, and South	)	
Carolina Department of Social Services,	)	
	)	
<u>Defendants.</u>	)	

Defendant South Carolina Department of Social Services moves to compel the production of a Settlement Agreement between Plaintiff and former co-defendant Boys Home of the South. Defendant South Carolina Department of Social Services relies upon the decision of South Carolina District Court Judge Bryan Harwell in *Wilshire v. WFOI, LLC*, 2015 WL 1643456 in support of its position that the subject settlement agreement is discoverable and should be produced.

After consultation, counsel for Plaintiff has no objection. Counsel for Boys of the South, Wallace Lightsey, has advised that Boys Home of the South has no objection. Upon information and belief, Mr. Lightsey also represents former employees of the now defunct Boys Home of the South but he has been unable to locate or contact them to obtain their consent to the disclosure of the Settlement Agreement.

Curtis Dowling, upon information and belief, also represented Boys Home of the South and its employees in this litigation. Mr. Dowling had advised that Boys Home of the South and its insurance carrier have no objection to the production of the settlement agreement. However,

he has also been unable to locate or contact the former Boys Home of the South employees regarding the disclosure of the Settlement Agreement.

Based on the foregoing, Defendant South Carolina Department of Social Services moves the Court for an order requiring the production of the subject settlement agreement between Plaintiff and Boys Home of the South.

Respectfully submitted,

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